

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

MICHELLE H., by her next friend Tamara Copping, **AVA R.**, by her next friend Tamara Copping, **ZAHARA L.**, by her next friend Deborah Wilson, **SAMMY V.**, by his next friend Aleksandra Chauhan, **ANDREW R.**, by his next friend Cheryl Kreider, **MARCUS, ANNIE, CAMERON, SARA, and ROGER B.**, by their next friend Margaret Wilson, and **KYLE S.**, by his next friend Tamara Copping,

Individually and on behalf of all other similarly situated children.

Plaintiffs

vs.

HENRY DARGAN MCMASTER, in his official capacity as Governor of the State of South Carolina,

MICHAEL LEACH, in his official capacity as State Director of the South Carolina Department of Social Services.

Defendants.

Civil Case No. 2:15-cv-134-RMG

NOTICE OF FILING

Plaintiffs hereby give notice of filing of their attached response to Defendants' submission, titled Richland County DSS Child Welfare Improvement Plan (ECF No. 339), pursuant this Court's Order of October 18, 2024 (ECF No. 331).

Respectfully submitted,

January 13, 2025
Columbia, South Carolina

s/Adam Protheroe
Susan B. Berkowitz (ID No. 1305)
Adam Protheroe (ID No. 11033)
SOUTH CAROLINA APPLESEED LEGAL
JUSTICE CENTER
P.O. Box 7187

Columbia, S.C. 29202
Telephone: (803) 779-1113
Facsimile: (803) 779-5951
sberk@scjustice.org
adam@scjustice.org

Matthew T. Richardson, (ID No. 7791)
WYCHE P.A.
801 Gervais Street, Suite B
Columbia, SC 29201
Telephone: (803) 254-6542
Facsimile: (803) 254-6544
mrichardson@wyche.com

Ira Lustbader (*Admitted Pro Hac Vice*)
Valerie Achille (*Admitted Pro Hac Vice*)
CHILDREN'S RIGHTS
88 Pine Street Suite 800
New York, New York 10005
Telephone: 212-683-2210
Facsimile: 212-683-4015
ilustbader@childrensrights.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on October 10, 2024 a copy of the foregoing NOTICE OF FILING was filed electronically and notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by certified mail to the parties listed below who are unable to accept electronic filing.

None

s/ Adam Protheroe